

**Cliff
STEARNS**

Congress

August 13, 2012

General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 6610

Dear General Counsel,

This is in response to your letter dated July 25, 2012, received by Friends of Cliff Stearns on July 30, 2012. This concerns four complaints filed by David Wolfson, a paid consultant to Congressional candidate Steve Oedrich and Steve Oedrich for Congress. The complaints are completely without merit as will be shown herein and will demonstrate that no action should be taken against Cliff Stearns or Friends of Cliff Stearns.

The first three complaints are essentially the same and allege a violation of Section 11 CFR 110.11(b)(1) on electronic mail communications on the dates of February 7, 9, and 10, 2012. The three electronic mail communications cited were all press releases, sent only to the Friends of Cliff Stearns press list, which at no time has had more than 57 recipients. Section 11 CFR 110.11(a)(1) specifically states that public communications, which must include a disclaimer, are defined as "electronic mail of more than 500 substantially similar communications when sent by a political committee". In sending the communications to only 57 recipients, no violation occurred under Section 11 CFR 110.11(b)(1) and no action should be taken by the Commission on these three complaints.

The fourth complaint also alleges a violation of Section 11 CFR 110.11(b)(1) and also Section 11 CFR 102.5(a)(2)(ii) and (iii) on the website of Friends of Cliff Stearns. The complainant includes selected screenshots from the campaign website taken on May 9, 2012. The website the screenshots were taken from no longer exists and was replaced by a new website in June, 2012. The website contained the proper disclaimer on the site's homepage and was clearly visible to anyone logging on to the website. The fact that the complainant's particular screenshots do not show a disclaimer fail to demonstrate that one did not exist.

The second alleged violation in this complaint is that the campaign's "outside vendor's contribution page, PayPal, does not make an effort to ensure contributions are in compliance with FECA regulations prohibiting contributions from corporations, labor organizations, federal government contractors and foreign nationals". Regulations require that "a federal committee must inform donors that their contributions will be used in

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Federal law requires that we report the name, mailing address, occupation, and name of employer for each individual whose total contributions exceed \$2500 in an election cycle. Federal Law does not allow corporate checks, and contributions are not tax deductible for federal income tax purposes. Please make checks payable to Friends for Cliff Stearns.

Paid for by Friends for Cliff Stearns

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FEDERAL ELECTION
COMMISSION

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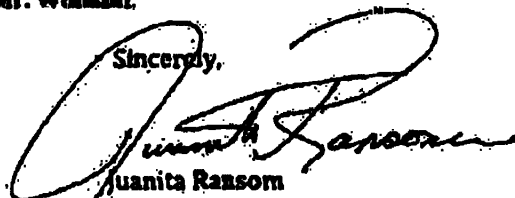
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connection with federal elections or that they are subject to the limits and prohibitions of the Act". Friends of Cliff Stearns is the "federal committee" and had the proper disclaimer on its website, which viewers first had to visit before being directed to the outside vendor's site. As previously stated, the website that the complainant's screenshots were taken from is no longer in existence and was replaced in June, 2012.

The Friends of Cliff Stearns website was not in violation of either Section 11 CFR 110.11(b)(1) or Section 11 CFR 102.5(a)(2)(ii) and (iii) and no action should be taken by the Commission on this complaint.

Based on the facts presented above, Cliff Stearns and Friends of Cliff Stearns were in full compliance with all federal campaign laws and regulations and there is no basis for the complaints alleged by Mr. Wolfson.

Sincerely,



Juanita Ransom
Treasurer
Friends of Cliff Stearns



Cliff Stearns
United States Representative